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United States District Court  
STATE AND DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

V.

CHRISTOPHER LEE ROUSSEAU

**CRIMINAL COMPLAINT**

Case Number: 12 mj 828 JS M

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about 12/03/2012, in Ramsey County, in the State and District of Minnesota, defendant(s) possessed a firearm, specifically a Rohm GMBH .22 caliber revolver, bearing serial number 158167, after having been convicted of a crime punishable by imprisonment for a term exceeding one year,

in violation of Title 18, United States Code, Section(s) 922(g).

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

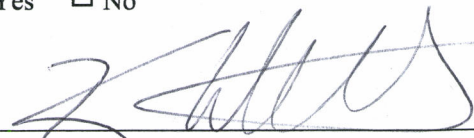
Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Sworn to before me, and subscribed in my presence,

Date

12/17/12  
The Honorable Janie S. Mayeron  
UNITED STATES MAGISTRATE JUDGE

Name & Title of Judicial Officer

  
Signature of Complainant  
Kylie Williamson  
ATF

at

St. Paul, MN  
City and State

  
Signature of Judicial Officer

SCANNED

DEC 18 2012

U.S. DISTRICT COURT ST. PAUL

STATE OF MINNESOTA     )  
                                      ) ss.         **AFFIDAVIT OF KYLIE M. WILLIAMSON**  
COUNTY OF RAMSEY        )

I, Kylie M. Williamson, being duly sworn, depose and state as follows:

1. I am a Special Agent with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), and have been so employed since August of 2007. Prior to that, your Affiant was employed by ATF for two years as an Industry Operations Investigator. Your Affiant is currently assigned to the St. Paul Group I Field Office, and works with various law enforcement agencies and drug task forces throughout the state of Minnesota. Your Affiant's responsibilities include conducting criminal investigations of individuals and organizations related to the violations of Federal laws, particularly those found in Titles 18, 21, and 26. Your Affiant has participated in numerous investigations which have resulted in the arrests, searches, seizures, and convictions of individuals who have violated Federal law.

2. This Affidavit is submitted in support of a Complaint establishing probable cause to believe that on December 3, 2012, Christopher Lee ROUSSEAU possessed a firearm in violation of Title 18, United States Code, Chapter 44, Section 922(g)(1).

3. The facts set forth in this Affidavit are based on my personal knowledge and observations in this investigation, on my review of police reports, and on discussions I have had with other law enforcement personnel directly involved in the investigation. The facts set forth herein contain information sufficient to support probable cause. This Affidavit is not intended to convey all of the facts learned during the course of this investigation.

4. Prior to 0030 hours on December 3, 2012, Officers with the Saint Paul Police Department (hereinafter SPPD), received information that Christopher Lee ROUSSEAU was in possession of a firearm. Additionally, Officers were informed that ROUSSEAU was driving a black "Jimmy" and would be traveling to St. Paul, MN, from Newport, MN, on Highway 61. SPPD Officers were familiar with ROUSSEAU and knew that he (ROUSSEAU) did not have a valid driver's license. Based on previous contacts with ROUSSEAU, SPPD Officers were also aware that ROUSSEAU was a convicted felon and that he (ROUSSEAU) was a known user and seller of methamphetamine.

5. At approximately 0030 hrs, Officers with the Saint Paul Police Department (hereinafter SPPD) observed a black GMC Jimmy traveling northbound on Highway 61. As SPPD Officers pulled up beside the black GMC Jimmy at a red light, near the intersection of Highway 61 and Warner Road in the city of Saint Paul, MN, SPPD Officers observed the male driver to be ROUSSEAU.

6. Based on ROUSSEAU'S invalid driver's license status, and the information SPPD Officers had previously received, SPPD Officers conducted a traffic stop on ROUSSEAU'S vehicle and subsequently arrested ROUSSEAU for Driving After Cancellation-Inimical to Public Safety.

7. During a search of ROUSSEAU'S person incident to arrest, SPPD Officers located two rounds of .22 caliber ammunition and \$385.00 cash in the pocket of ROUSSEAU'S pants.

8. SPPD Officers then removed the remaining three occupants from ROUSSEAU'S vehicle. During the subsequent search of the vehicle, SPPD Officers recovered a Rohm GMBH, .22LR caliber revolver and a quantity of suspected methamphetamine.

9. During a recorded Miranda interview, ROUSSEAU advised that the revolver recovered from his (ROUSSEAU'S) vehicle belonged to him (ROUSSEAU'S) and that he (ROUSSEAU) had purchased the firearm approximately one week prior to being arrested because someone had attempted to rob him (ROUSSEAU). ROUSSEAU also stated that the recovered methamphetamine belonged to him (ROUSSEAU) and further advised that he (ROUSSEAU) sold approximately one to two ounces of methamphetamine per week in order to keep a little money in his (ROUSSEAU'S) pocket.

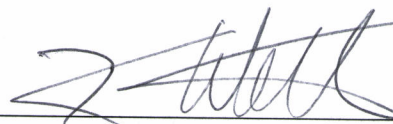
10. Your Affiant determined that the firearm recovered from ROUSSEAU'S vehicle, namely, a Rohm GMBH, .22LR caliber revolver,

bearing serial number 158167, was manufactured outside of the State of Minnesota (Germany). Therefore, at some point after manufacture, the aforementioned firearm traveled in interstate and/or foreign commerce into the State of Minnesota as defined in Title 18, United States Code, Chapter 44, Section 921(g) (1).

11. Your Affiant has also reviewed ROUSSEAU'S criminal history and determined that ROUSSEAU has the following felony convictions: 5<sup>TH</sup> Degree Drugs (5/12/2006); Theft (5/12/2006); Theft (5/3/2007); Fleeing Police in a Motor Vehicle (4/6/2007); Theft (2/26/2009); Theft (6/12/2009); Burglary (4/12/2011); Burglary (2/1/2011); Theft of a Motor Vehicle (4/8/2011); Fleeing Police in a Motor Vehicle (4/8/2011); Receipt of Stolen Property (5/16/2011); and Theft of a Motor Vehicle (2/1/2011). As a convicted felon, ROUSSEAU is prohibited from possessing firearms.

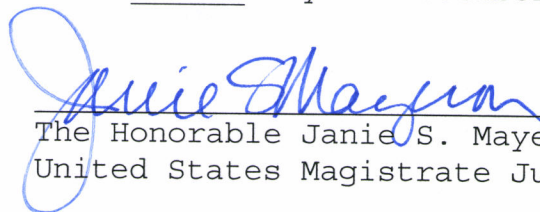
12. Based on my training, experience and participation in this and other investigations, I believe probable cause exists that Christopher Lee ROUSSEAU possessed a firearm in violation of Title 18, United States Code, Chapter 44, Sections 922(g)(1)

Further your Affiant sayeth not.

  
KYLIE M. WILLIAMSON  
SPECIAL AGENT, ATF

SUBSCRIBED and SWORN to before me

this 17 th day of December, 2012

  
The Honorable Janie S. Mayeron  
United States Magistrate Judge